

**STATEMENT OF BASIS (AI No. 24629)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0115355 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Ferrara Fire Apparatus, Inc.  
P.O. Box 249  
Holden, LA 70744

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Kelli Hamilton

**DATE PREPARED:** January 12, 2007

**1. PERMIT STATUS**

**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B.** LPDES permit - LPDES permit effective date: March 1, 2002  
LPDES permit expiration date: February 28, 2007  
EPA has not retained enforcement authority.

**C.** Date Application Received: November 30, 2006

**2. FACILITY INFORMATION**

**A. FACILITY TYPE/ACTIVITY - fire truck manufacturer**

This is an existing facility that manufactures/assembles fire trucks along with wholesale and retail sale of fire fighting equipment.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 3711 and 5087

**C. LOCATION -** 27855 James Chapel Road North in Holden, Livingston Parish  
Latitude 30°28'34", Longitude 90°37'16"

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### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: treated sanitary wastewater  
Treatment: sanitary treatment plant with aeration, clarification, sludge return, & chlorination  
Location: at the point of discharge from the sanitary treatment system  
Flow: 4,000 gpd  
Discharge Route: an unnamed ditch, thence into Hickory Branch, thence into Blood River

#### Outfall 002

Discharge Type: hydrostatic wastewater, previously monitored treated sanitary wastewater  
Treatment: none  
Location: at the point of discharge from the lagoon  
Flow: intermittent  
Discharge Route: an unnamed ditch, thence into Hickory Branch, thence into Blood River

#### Outfall 102

Discharge Type: treated sanitary wastewater  
Treatment: sewer treatment plant with hypo chlorination  
Location: at the point of discharge from the sanitary treatment system  
Flow: 500 gpd  
Discharge Route: into lagoon Outfall 002

#### Outfall 003

Discharge Type: equipment washwater  
Treatment: none  
Location: at the point of discharge from the vehicle being washed  
Flow: intermittent  
Discharge Route: an unnamed ditch, thence into Hickory Branch, thence into Blood River

### 4. RECEIVING WATERS

STREAM - unnamed ditch, thence into Hickory Branch, thence into Blood River

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040502

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife

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## 5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit:

Outfall 001 is only treated sanitary wastewater. Equipment washwater, which was in Outfall 001, is now Outfall 003. Outfall 102 has been added. A 500 gpd sanitary plant was installed and discharges to Outfall 002.

## 6. COMPLIANCE HISTORY/COMMENTS

### A. Compliance History

No records of recent compliance actions were found.

B. DMR Review/Excursions - DMRs were reviewed from January 2004 to September 2006. The excursions are as follows:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
10/05-12/05	Fecal Coliform	001	>2000	400
7/06-9/06	COD	001	104	100

## 7. EXISTING EFFLUENT LIMITS

Outfall 001 -		Outfall 002 -	
COD	--:100 mg/l	Oil and Grease	--:15 mg/l
BOD	--:45 mg/l	TSS	--:90 mg/l
TSS	--:45 mg/l	pH	6-9
Oil and Grease	--:15 mg/l		
Fecal Coliform	--:400 colonies/100ml		
pH	6-9		

## 8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040502 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which is listed as a threatened species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

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## **9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

## **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

## **12. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 3711 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

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### Rationale for Ferrara Fire Apparatus, Inc.

1. **Outfall 001** sanitary wastewater (estimated flow is 4,000 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Weekly Avg. (mg/l)	<u>Reference</u>
Flow (GPD)	---: Report	
BOD	---: 45 mg/l	Similar discharges* (BPJ)
TSS	---: 45 mg/l	Similar discharges* (BPJ)
Fecal Coliform	---: 400 mg/l	Similar discharges* (BPJ)
pH	6.0 - 9.0 su	Similar discharges* (BPJ)

**Treatment:** 4,000 GPD sanitary treatment plant with aeration, clarification, sludge return, & chlorination

**Monitoring Frequency:** semiannually for all parameters

**Limits Justification:** current guidance for similar discharges from other facilities, and the previous permit.

2. **Outfall 002** hydrostatic wastewater and previously monitored treated sanitary wastewater (estimated flow is intermittent)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow (GPD)	---: Report	
Oil & Grease	---: 15 mg/l	LAG670000 * (BPJ)
TSS	---: 90 mg/l	LAG670000 * (BPJ)
pH	6.0 - 9.0 su	LAG670000 * (BPJ)

**Treatment:** None

**Monitoring Frequency:** semiannually for all parameters

**Limits Justification:** Limits are BPJ'd based on the hydrostatic general permit and monitoring frequencies are based on BPJ due to the low potential for contamination, and the previous permit.

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3. **Outfall 102** sanitary wastewater (estimated flow is 500 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Weekly Avg. (mg/l)	<u>Reference</u>
Flow (GPD)	---: Report	
BOD	---: 45 mg/l	Similar discharges* (BPJ)
TSS	---: 45 mg/l	Similar discharges* (BPJ)
Fecal Coliform	---: 400 mg/l	Similar discharges* (BPJ)

**Treatment:** 500 GPD sanitary treatment plant

**Monitoring Frequency:** semiannually for all parameters

**Limits Justification:** current guidance for similar discharges from other facilities.

4. **Outfall 003** equipment washwater (estimated flow is intermittent)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow	Report: Report	See limits justification*
COD	200: 300	See limits justification*
TSS	---: 45	See limits justification*
Oil & Grease	---: 15	See limits justification*
Oil & Grease, Visual	No Presence	See limits justification*
Soaps/Detergents	Report	See limits justification*
pH (s.u.)	6.0: 9.0 (min: max)	See limits justification*

**Treatment:** None

**Monitoring Frequency:** COD, TSS, Oil and Grease, Soaps/Detergents, and pH shall be monitored 1/quarter. Oil & Grease-Visual shall be observed 1/day.

**Limits Justification:** COD, TSS, Oil and Grease, Oil & Grease-Visual, Soaps/Detergents, and pH are permitted based on current guidance for similar discharges.

\* Existing permits for similar outfalls  
 BPJ Best Professional Judgement  
 su Standard Units

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NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL Waterbodies

Subsegment 040502, Tickfaw River-La. Hwy 42 to Lake Maurepas, is listed on LDEQ's Final 2004 303(d) List as impaired for phosphorus (EPA - Category 5), nitrogen (EPA - Category 5), chlorides, sulfates, TDS, mercury, and dissolved oxygen (EPA - Category 5). To date no TMDL's have been completed for this subsegment. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the fire truck manufacturing facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Therefore, for the purposes of this permit, phosphorus, nitrogen, and dissolved oxygen will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

Nutrients (phosphorus, nitrogen)

LDEQ's position, as stated in the declaratory ruling issued by Dale Givens regarding water quality criteria for nutrients (Sierra Club v. Givens, 710 So.2d 249 (La. App. 1st Cir. 1997)m writ denied, 705 So.2d 1106 (La. 1998)), is that when oxygen demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. Dissolved oxygen will be controlled by the BOD and COD limits.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

**CERTIFIED MAIL** \_\_\_\_\_ **-RETURN RECEIPT REQUEST**

File No.: LA0115355

AI No.: 24629 Activity No.: PER20060001

Mr. Christopher Ferrara, CEO  
Ferrara Fire Apparatus, Inc.  
P.O. Box 249  
Holden, LA 70744

**RE:** Draft Louisiana Pollutant Discharge Elimination System (LPDES) permit to discharge treated sanitary wastewater, equipment washwater, hydrostatic test wastewater, and stormwater runoff to an unnamed ditch, thence into Hickory Branch, thence into Blood River from an existing fire truck manufacturer located at 27855 James Chapel Road North in Holden, Livingston Parish.

Dear Mr. Ferrara:

The Department of Environmental Quality proposes to reissue a LPDES permit with the effluent limitations, monitoring requirements, and special conditions listed in the attached DRAFT PERMIT. Please note that this is a DRAFT PERMIT only and as such does not grant any authorization to discharge. Authorization to discharge in accordance with this permitting action will only be granted after all requirements described herein are satisfied and by the subsequent issuance of a FINAL PERMIT. Upon the effective date of the FINAL PERMIT, the FINAL PERMIT shall replace the previously effective State (LPDES) permit.

This Office will publish the enclosed public notice one time in a local newspaper of general circulation and the Office of Environmental Services Public Notice Mailing List. In accordance with LAC 33:IX.6521.A, the applicant shall receive and is responsible for paying the invoice from the above mentioned newspaper. LAC 33:IX.6521.A states: "...the costs of publication shall be borne by the applicant."

The invoice, fee rating sheets, and a copy of the fee regulations will be sent under a separate cover letter as applicable. A copy of the entire Louisiana Water Quality Regulations may be obtained from the DEQ Office of Environmental Assessment, Post Office Box 4314, Baton Rouge, Louisiana 70821-4314, (225) 219-3236.

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV



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Pursuant to LAC 33:IX.1309.I, LAC 33:IX.6509.A.1 and LAC 33:I.1701, you must pay any outstanding fees to the Department. Therefore, you are encouraged to verify the facility's fee status by contacting LDEQ's Office of Management and Finance, Financial Services Division (225) 219-3863. Failure to pay in the manner and time prescribed could result in applicable enforcement actions as prescribed in the Environmental Quality Act, including, but not limited to revocation or suspension of the applicable permit, and/or assessment of a civil penalty against you.

For sanitary treatment plants, the plans and specifications must be approved by the Department of Health and Hospitals, Office of Public Health, P.O. Box 4489, Baton Rouge, LA 78021-4489, (225) 342-7395.

Should you have any questions concerning any part of the DRAFT PERMIT, public notice requirements, or fee, please contact Kelli Hamilton, Office of Environmental Services, at the address on the preceding page, telephone (225) 219-3106. To ensure that all correspondence regarding this facility is properly filed into the Department's Electronic Document Management System, you must reference your Agency Interest (AI) number 24629 and LPDES permit number LA0115355 on all future correspondence to this Department, including Discharge Monitoring Reports.

Sincerely,



Jesse Chang, Environmental Scientist Manager  
Industrial Water Permits Section

klh

Attachment(s) draft permit, dated public notice, statement of basis, and fee sheet:

cc: Kelli Hamilton  
Water Permits Division

IO-W

ec: Ms. Gayle Denino  
Office of Management & Finance

Permit Compliance Unit  
Office of Environmental Compliance

Cheryl LeJeune  
Water Permits Division